

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF  
KENTUCKY

Mario Payne v. Commonwealth of Kentucky, et al.

Payne · No. 26-267-DLB · Decided June 18, 2026

SUMMARY

The court granted Mario Payne's motion to proceed in forma pauperis and dismissed his 42 U.S.C. § 1983 complaint concerning the alleged disclosure of competency-evaluation results during a state-court hearing. The court concluded that the complaint did not state a federal claim, that official-capacity claims were barred by the Eleventh Amendment, that any individual-capacity claim against the prosecutor was barred by absolute prosecutorial immunity, and that the claim was untimely. The action was stricken from the docket.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                      |
|-----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Eastern District of Kentucky                                                                                                                                                                                                                    |
| WRITING FOR THE COURT | David L. Bunning                                                                                                                                                                                                                                                                     |
| JURISDICTION          | United States District Court for the Eastern District of Kentucky                                                                                                                                                                                                                    |
| DECIDED               | June 18, 2026                                                                                                                                                                                                                                                                        |
| DOCKET                | 26-267-DLB                                                                                                                                                                                                                                                                           |
| DISPOSITION           | dismissed                                                                                                                                                                                                                                                                            |
| PROCEDURAL POSTURE    | The plaintiff, a state inmate proceeding pro se, filed a civil-rights complaint under 42 U.S.C. § 1983 and moved to proceed in forma pauperis. Before service of process, the district court screened the complaint and dismissed it.                                                |
| STANDARD OF REVIEW    | At preliminary screening, the court accepted non-conclusory factual allegations as true and liberally construed the plaintiff's legal claims, while dismissing claims that were frivolous or malicious, failed to state a claim, or sought monetary relief from an immune defendant. |
| PRECEDENTIAL VALUE    | unpublished district court memorandum opinion and order                                                                                                                                                                                                                              |
| PARTIES               | Mario Payne v. Commonwealth of Kentucky, Robert Sanders, in his official capacity                                                                                                                                                                                                    |

TOPICS

section 1983

civil rights

eleventh amendment immunity

statute of limitations

pleadings

## PRACTICE AREAS

civil rights

constitutional law

civil procedure

government liability

remedies

## QUESTIONS PRESENTED

1. Whether Payne stated a viable claim under 42 U.S.C. § 1983 when his allegations asserted state-law tort claims and did not plausibly allege a violation of federal law.
2. Whether the Eleventh Amendment barred Payne's damages claim against the Commonwealth of Kentucky and his official-capacity claim against Sanders.
3. Whether Sanders would be absolutely immune from an individual-capacity damages claim for conduct occurring during a competency hearing and related to the criminal proceeding.
4. Whether an individual-capacity § 1983 claim based on conduct occurring on August 19, 2024, was barred by Kentucky's one-year statute of limitations.

## HOLDINGS

1. The complaint failed to state a viable § 1983 claim because it appeared to assert only state-law tort claims and did not plausibly allege a violation of federal law.
2. The Eleventh Amendment barred the damages claim against the Commonwealth of Kentucky and the official-capacity claim against Sanders because an official-capacity claim is effectively a claim against the State.
3. Even if liberally construed as an individual-capacity claim, Payne's claim against Sanders was barred by absolute prosecutorial, or quasi-judicial, immunity because the challenged conduct occurred during a court hearing and was directly related to the court's determination of Payne's competency.
4. Any individual-capacity § 1983 claim was barred by Kentucky's one-year statute of limitations because Payne filed suit approximately ten months after the limitations deadline.

## KEY QUOTATIONS

*“Likewise, his claim against Commonwealth’s Attorney Sanders in his official capacity is “in fact . . . against the official’s office and thus the sovereign itself.”” (2)*

*“First, “a prosecutor enjoys absolute immunity from § 1983 suits for damages when he acts within the scope of his prosecutorial duties.”” (2)*

## FACTUAL BACKGROUND

Payne alleged that, during a court hearing on August 19, 2024, Commonwealth's Attorney Robert Sanders shouted the results of Payne's competency evaluation in open court while members of the public were present. Payne sued the Commonwealth of Kentucky and Sanders in his official capacity for damages, asserting unspecified privacy violations, defamation, invasion of privacy, and intentional infliction of mental anguish. The

court noted that records appeared to show different dates for the competency evaluation and hearing but accepted Payne's alleged date for screening purposes.

## PROCEDURAL HISTORY

Payne alleged that a prosecutor publicly disclosed the results of his competency evaluation during a court hearing and asserted privacy, defamation, invasion-of-privacy, and intentional-infliction-of-mental-anguish claims. The court granted in forma pauperis status for purposes of review, screened the complaint under 28 U.S.C. §§ 1915(e)(2) and 1915A, dismissed the complaint, and struck the matter from the docket.

## DISPOSITION

dismissed

## CASES CITED

- Hill v. Lappin, 630 F.3d 468, 470-71 (6th Cir. 2010)
- Davis v. Prison Health Services, 679 F.3d 433, 437-38 (6th Cir. 2012)
- Ernst v. Rising, 427 F.3d 351, 358 (6th Cir. 2005)
- Edelman v. Jordan, 415 U.S. 651, 662-63 (1974)
- Lewis v. Clarke, 581 U.S. 155, 162 (2017)
- Hopper v. Phil Plummer, 887 F.3d 744, 760 n.4 (6th Cir. 2018)
- Imbler v. Pachtman, 424 U.S. 409, 420 (1976)
- Imbler v. Pachtman, 424 U.S. 409, 430-31 (1976)
- Bonner v. Perry, 564 F.3d 424, 431 (6th Cir. 2009)
- Southeast Kentucky Baptist Hospital, Inc. v. Gaylor, 756 S.W.2d 467, 469 (Ky. 1988)
- Gray v. Lexington-Fayette Urban County Government, No. 5:13-CV-45-DCR, 2013 WL 3322609, at \*8 (E.D. Ky. July 1, 2013)
- Commonwealth v. Payne, No. 24-CR-213 (Kenton Cir. Ct. 2024)